

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CHRISTOPHER J. TRIBBLE,

Plaintiff,

V.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,¹

Defendant.

No. 2:20-cv-02263-JDP

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

ECF No. 14

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended sixty (60) days from January 16, 2022, to March 17, 2022. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Defendant respectfully requests this additional time because Counsel for Defendant has been unable to devote the time required to complete

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted, therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 Defendant's response to Plaintiff's Motion for Summary Judgment. The undersigned attorney
2 has recently been out on leave due to the birth of his second child and will continue to be out of
3 the office on extended family leave until January 11, 2022. Although Counsel for Defendant will
4 return to the office prior to the original deadline for his responsive brief, he has 10 responsive
5 briefs due in the second half of January and early February. Additionally, as this Court no doubt
6 knows, Social Security case filings in federal court increased significantly in the past year. The
7 increased filings, compounded by COVID-related delays in transcript production and attorney
8 attrition, have resulted in an increased workload and competing deadlines. An extension until
9 March 17, 2022 should give sufficient time for Counsel for Defendant to complete the response to
10 Plaintiff's Opening Brief. Counsel apologizes to the Court for any inconvenience caused by this
11 delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

Respectfully submitted,

PHILLIP A. TALBERT
Acting United States Attorney

DATE: November 14, 2021

By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ DE LLANO
Special Assistant United States Attorney
Attorneys for Defendant

Respectfully submitted,

Attorneys for Plaintiff

DATE: November 14, 2021

By: /s/ Jared Thomas Walker *
JARED THOMAS WALKER
Law Office of Jared T. Walker, PC
(*as authorized by email)

ORDER

2 The parties' stipulation is construed as a motion and granted. ECF No. 14. Defendant
3 shall have an extension, up to and including March 17, 2022, to respond to plaintiff's motion for
4 summary judgment.

IT IS SO ORDERED.

Dated: December 17, 2021

Henry Peters

JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE